

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

\*\*\*\*\*  
Jonathan Leite, \*  
Plaintiff \*  
\*  
v. \* Civil No. 15-cv-00280-PB  
\*  
Matthew Goulet *et al.*, \*  
Defendants \*  
\*  
\*\*\*\*\*

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants Matthew Goulet, Elmer Van Hoesen, Michael Beaton, Lynn McLain, Trevor Dube, Rhianne Snyder, Eddy L'Heureux, Heather Marquis, Jeffrey Smith, Dwane Sweatt, Yair Balderrama, Bob Morin, Kathy Bergeron, and Ejike Esobe hereby move for summary judgment in their favor on all claims brought by Plaintiff, pursuant to Fed. R. Civ. P. 56, for the reasons stated in the defendants' memorandum in support of this motion, together with its exhibits, submitted herewith. *See* L.R. 7.1(a)(2).

WHEREFORE, the defendants respectfully request that this Honorable Court:

- A. Enter Summary Judgment in favor of all Defendants; and
- B. Grant such further relief as may be deemed just and proper.

Respectfully submitted,

MATTHEW GOULET, *ET AL*

By their attorneys,

GORDON J. MACDONALD  
ATTORNEY GENERAL

Date: October 13, 2017

/s/ Lynmarie C. Cusack  
Lynmarie C. Cusack, NH Bar No. 11266  
Senior Assistant Attorney General  
Francis C. Fredericks, NH Bar No. 21161  
Assistant Attorney General  
Department of Justice  
33 Capitol Street  
Concord, NH 03301-6397  
(603) 271-3650  
[lynmarie.cusack@doj.nh.gov](mailto:lynmarie.cusack@doj.nh.gov)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 13<sup>th</sup> day of October 2017, via this court's ECF system, to Benjamin T. King, counsel of record for plaintiff Jonathan Leite.

/s/ Lynmarie C. Cusack  
Lynmarie C. Cusack